

INTERVENTION



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Arizona Corporation Commission

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BEFORE THE ARIZONA CORPORATION COMMISSION

ARIZONA CORPORATION COMMISSION
DOCUMENT CONTROL

In the Matter of the Investigation Into

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Docket No. T-00000-A-97-0238

U S WEST COMMUNICATIONS, INC.'S
Compliance with Section 271 of the
Telecommunications Act of 1996

**PETITION OF ALLEGIANCE
TELECOM OF ARIZONA,
INC. TO INTERVENE**

Allegiance Telecom of Arizona, Inc. ("Allegiance"), pursuant to A.A.C.R. 14-3-105, hereby requests leave to intervene in the above-entitled docket. In support of its request, Allegiance states as follows:

I.

All communications with Allegiance should be directed to the following persons:

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II.

Allegiance Telecom, Inc. ("Allegiance") is a facilities-based telecommunications company that is authorized by the Commission to provide Competitive Facilities Based and Resold Intrastate Telecommunications throughout the State of Arizona. Allegiance only recently began to offer services in competition with Quest Corporation, f/k/a U S WEST Communications, Inc. ("Qwest"). Pursuant to the federal Telecommunications Act of 1996 ("Act"), Allegiance entered into an interconnection agreement with Quest, which the Commission approved and which currently is in full force and effect.

III.

As a competitor and a party to an interconnection agreement with Quest, Allegiance has a substantial interest in the issues to be addressed in this proceeding. Allegiance obtains or intends to obtain interconnection trunks, unbundled network elements, collocation, and other facilities and services from Quest under the terms and conditions of the parties' interconnection agreement. In this proceeding, Quest must demonstrate that the access to, and interconnection with, its network that Quest provides to Allegiance and other competitors pursuant to Commission-approved interconnection agreements satisfies the 14-point checklist, among other requirements, as a prerequisite for obtaining authority to provide interLATA services. Accordingly, Section 271 represents the primary, if not sole, incentive for Qwest to comply with its obligations under the Act and to open its local exchange markets to effective competition. The Commission's review of Qwest's

1 compliance with Section 271, therefore, will directly and materially affect Allegiance and
2 its ability to provide telecommunications services in Arizona.

3 IV.

4
5 As a competing local exchange company ("CLEC") with a direct and particular
6 interest in the outcome of these proceedings, Allegiance's participation will be of material
7 value to the Commission. Allegiance's intervention will not broaden the issues to be
8 addressed or delay the proceedings, and Allegiance will coordinate with other parties with
9 similar interests to minimize any duplication or overlap in presentation of positions.
10

11 WHEREFORE, Allegiance respectfully requests leave to intervene as a party to this
12 proceeding.

13 RESPECTFULLY SUBMITTED this 10th day of October, 2000.
14

15 LEWIS AND ROCA, LLP

16
17 By Tom H. Campbell
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Attorneys for Allegiance Telecom of Arizona, Inc.

22 ORIGINAL and ten (10)
23 copies of the foregoing filed
24 this 10th day of October, 2000,
25 with:

26 Arizona Corporation Commission
Docket Control – Utilities Division
1200 W. Washington Street
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1 COPY of the foregoing hand-
2 delivered this 10th day of October, 2000,
3 to:

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5 Legal Division
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7 1200 W. Washington Street
8 Phoenix, Arizona 85007

9 Jerry Rudibaugh, Chief Hearing Officer
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